



Eric Gonzalez  
District Attorney

DISTRICT ATTORNEY  
KINGS COUNTY  
350 JAY STREET  
BROOKLYN, NY 11201-2908  
(718) 250-2000  
WWW.BROOKLYNDA.ORG

[INSERT NAME]  
Assistant District Attorney

[INSERT DATE]

[INSERT D/C INFO]

Re: [INSERT CASE NAME]  
Kings County Dkt./Ind. No. [#####]

In connection with the above-named case, the People voluntarily provide the following information regarding:

MOS NAME: JUSTIN JOSEPH

MOS TAX: [REDACTED]

in satisfaction (to the extent applicable) of their constitutional, statutory, and ethical obligations. Further, the People reserve the right to move in limine to preclude reference to this information, or otherwise to object to its use and/or introduction into evidence.

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**Disclosure:**

ON APRIL 19, 2015, [REDACTED]

[REDACTED] MOS JOSEPH, [REDACTED]

[REDACTED] THE PEOPLE RECEIVED THE RESULTS OF THE BLOOD TEST, INDICATING THAT NO ALCOHOL HAD BEEN PRESENT IN THE DRIVER'S BLOOD [REDACTED]

[REDACTED] THE DRIVER SUBSEQUENTLY FILED A CIVIL LAWSUIT, ALLEGING, INTER ALIA, THAT THE DRIVER WAS THE VICTIM OF A FALSE AND IMPROPER ARREST, MOTIVATED BY THE POLICE OFFICERS' DESIRE TO AVOID CULPABILITY FOR CAUSING THE VEHICULAR COLLISION DESCRIBED ABOVE.

**IN ADDITION, BASED UPON CCRB DOCUMENTS UP TO DATE THROUGH OCTOBER 13, 2020, THE PEOPLE ARE UNAWARE OF ANY PENDING AND OR SUBSTANTIATED CCRB ALLEGATIONS.**

Eric Gonzalez  
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Kings County